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MLC Intellectual Property, LLC
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 MLC INTELLECTUAL PROPERTY,
12 LLC,

13 Plaintiff,

14 v.

15 MICRON TECHNOLOGY, INC.,
16

17 Defendant.
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Case No. 3:14-cv-03657 SI

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
DEADLINE TO SUBMIT JOINT CASE
MANAGEMENT CONFERENCE
STATEMENT**

1 Plaintiff MLC Intellectual Property, LLC (“MLC”) and defendant Micron Technology,
2 Inc. (“Micron”) respectfully submit the following Stipulation and [Proposed] Order to Continue
3 Case Management Conference and Deadline to Submit Joint Case Management Conference
4 Statement.

5 WHEREAS, MLC filed a Motion to Lift Stay on February 24, 2016. (Dkt. No. 40.)

6 WHEREAS, a hearing on MLC’s Motion to Lift Stay was set for April 15, 2016 at 9:00
7 a.m. before the Honorable Susan Illston.

8 WHEREAS, on March 29, 2016, the Court granted the motion, vacated the hearing, and
9 scheduled a case management conference for April 15, 2016 at 3:00 p.m. (Dkt. Nos. 43 & 44.)

10 WHEREAS, MLC’s counsel has a scheduling conflict on April 15, 2016 and seeks to
11 continue the case management conference to a date convenient for the Court and all counsel.

12 WHEREAS, Micron’s counsel has scheduling conflicts on April 22, 2016 and April 29,
13 2016.

14 WHEREAS, the next available date on the Court’s Further Case Management Conference
15 schedule on which counsel for MLC and counsel for Micron are available is May 6, 2016 at 3:00
16 p.m.

17 WHEREAS, the deadline to submit a joint case management conference statement in
18 advance of the scheduled April 15, 2016 further case management conference is Friday, April 8,
19 2016.

20 WHEREAS, there has been one prior time modification in the case for Micron to respond
21 to MLC’s complaint. (Dkt. No. 12.)

22 WHEREAS, the requested time modification will not have an effect on the schedule for
23 the case.

24 NOW, THEREFORE, pursuant to Civil L.R. 6-1(b), 6-2, 7-12, it is hereby STIPULATED
25 AND AGREED, by and between the parties, that the Further Case Management Conference be
26 continued from April 15, 2016 at 3:00 p.m. to May 6, 2016 at 3:00 p.m. and the deadline to
27 submit the case management conference statement be continued from April 8, 2016 to April 29,
28 2016.

1 Dated: April 7, 2016

FREITAS ANGELL & WEINBERG LLP

2
3 /s/Daniel J. Weinberg

4 Daniel J. Weinberg
5 Attorneys for Plaintiff
6 MLC Intellectual Property, LLC

7 Dated: April 7, 2016

FISH & RICHARDSON P.C.

8 /s/Michael R. Headley

9 Michael R. Headley
10 Attorneys for Defendant
11 Micron Technology, Inc.

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13 Dated: 4/11/16

14 

15 Hon. Susan Illston
16 United States District Judge

17
18 **ATTESTATION**

19 I, Daniel J. Weinberg, am the ECF User whose ID and password are being used to file this
20 **STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE**. I attest that,
21 pursuant to United States District Court, Northern District of California Civil L.R. 5-1(i)(3) and
22 General Order 45, concurrence in the filing of this document has been obtained from Counsel for
23 Defendant Micron Technology, Inc. I declare under penalty of perjury that the foregoing is true
24 and correct.

25 Dated: April 7, 2016

26 /s/Daniel J. Weinberg

27 Daniel J. Weinberg